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July 26, 2006

VIA CERTIFIED MAIL

Kim Muratore, Case Developer (SFD-7-B)  
U.S. EPA, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

Re: General Notice Letter/104(e) for the San Fernando Valley/North  
Hollywood Superfund Site  
North Hollywood, California

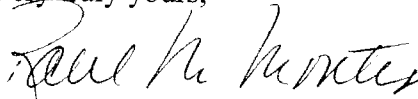
Dear Ms. Muratore:

In further response to the information request contained in your General Notice Letter dated April 25, 2006, Los Angeles By-Products Co. submits the enclosed preliminary information, together with a claim of confidentiality and continuing general objections, which are enclosed herewith. Due to the amount of documents being sent, they are being separately delivered by a common courier.

The information being provided herewith completes the responses to the requests for information contained in your General Notice Letter dated April 25, 2006.

Although the information was originally agreed to be provided by July 19, 2006, Michael Massey allowed an additional week to respond.

Very truly yours,



Raul M. Montes

General Objections To General Notice Letter (104(e))  
And To Definitions Applicable To Appendix D; To Enclosure D:  
Information Request And To All Contents Therein

“The Company” (as defined by EPA) and “Responding Party” shall be used interchangeably herein. Responding Party hereby raises a continuing objection to each and every Request for Information (“Request”) contained in General Notice Letter/104(e) dated April 25, 2006, for the San Fernando Valley/North Hollywood Superfund site. Rather than repeat each objection for each request, Responding Party objects on the following grounds, including but not limited to, the Requests are overly broad; not reasonably limited in scope and time; are vague, ambiguous and uncertain, lack reasonable particularity; are burdensome and oppressive; and have been previously asked and answered. Responding Party hereby reserves its right to raise other objections, including but not limited to attorney-client privilege, attorney work-product doctrine and any other privileges, to the fullest extent provided by law.

Responding Party reserves the right to challenge the constitutionality and/or legality of each and every Request contained therein and to the entire contents of the General Notice Letter.

Responding Party is presently not engaged in litigation with EPA and therefore, these responses are made without prejudice to Responding Party’s rights to present additional documents in the future, whether it be prior to any litigation and/or further proceedings in this action or as evidence at trial.

Responding Party, while complying with EPA’s timetables, has not had the opportunity for conferring, adjudicating or otherwise limiting, modifying any of the Requests. Therefore, further investigation and/or discovery may lead to additions to, changes in and variations from the responses herein set forth. The responses are given without prejudice to Responding Party’s ability to produce evidence of any subsequently discovered documents or facts and to change any and all responses herein, and/or to seek any limitations, challenges, and modifications of each and every Request. Responding Party also reserves its rights to challenge any and all Requests on privacy and/or confidentiality grounds at any time herein. Such reservations and challenges are applicable to the “Definitions applicable to Appendix D”.

These General Objections are applicable to any and all Responses submitted to the EPA by Responding Party, including its prior set of Responses.

If Responding Party becomes a defendant or party to any future litigation, Responding Party reserves its rights to seek any protective orders, modification orders and/or any available protections with regard to each and every Request.

Claim of Confidentiality  
Applicable to the  
Solid Waste Assessment Test Reports  
and Other Reports Provided

Please see the accompanying Solid Waste Assessment Test Reports and related documents (herein referred to as "SWAT"). The company is stating a claim of confidentiality as stated in each of the following responses and pursuant to sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C., §9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b) and any other relevant and/or applicable Statutes.

The following confidentiality claims are applicable to each and every of the following SWAT documents:

Ground Water Monitoring Report  
Annual Report, 1985-86  
Penrose Landfill

Ground Water Monitoring Report  
First Quarter, 1986  
Penrose Landfill

Environmental Risk Analysis System  
Final Report, 29 January 1979  
Penrose Pit Sanitary Landfill

Regional Water Quality Control Board  
April 17, 1987

Ground Water Monitoring Report  
Second Quarter, 1987  
Penrose Landfill

Proposed Solid Waste Assessment Test  
Monitoring Program  
Tuxford Landfill

Solid Waste Assessment  
Test Water  
Tuxford Landfill

Solid Waste Assessment Test Water  
Penrose and Newberry Landfills

Proposed Solid Waste Assessment Test  
Monitoring Program  
Tuxford Landfill

Report of Geotechnical Investigation  
Proposed Strathern Sanitary Landfill

Solid Waste Assessment Test  
Supplementary Monitoring Report  
Tuxford Landfill

Solid Waste Assessment Test  
Supplementary Monitoring Report  
Penrose and Newberry Landfills and Strathern Pit

Construction and Testing of Monitoring Wells  
Tuxford Landfill  
January 1989

Construction and Testing of Monitoring Wells  
Penrose and Newberry Landfills  
January 1989

Third Quarter 1999  
Groundwater Monitoring Report  
Strathern Landfill

Second SWAT Supplemental Monitoring Report  
Tuxford Landfill  
December 17, 1990

Second SWAT Supplemental Monitoring Report  
Tuxford Landfill  
December 17, 1990

Third Quarter 1999  
Groundwater Monitoring Report  
Strathern Landfill

1996 Annual Report  
Groundwater Monitoring  
Strathern Landfill

Groundwater Monitoring Report  
Third Quarter 1996  
Strathern Landfill

First Quarter 1996  
Groundwater Monitoring Report  
Strathern Landfill

1995 Annual Report  
Groundwater Monitoring  
Strathern Landfill

Groundwater Monitoring Report  
First Quarter 1995  
Strathern Landfill

Groundwater Monitoring Report  
Third Quarter 1994  
Strathern Landfill

Groundwater Monitoring Report  
First Quarter 1994  
Strathern Landfill

1994 Annual Report  
Groundwater Monitoring  
Strathern Landfill

Groundwater Monitoring Report  
First Quarter 1993  
Strathern Landfill

Groundwater Monitoring Report  
Second Quarter 1993  
Strathern Landfill

Groundwater Monitoring Report  
Third Quarter 1993  
Strathern Landfill

1993 Annual Report  
Groundwater Monitoring  
Strathern Landfill



# CBI

Claim of Confidentiality

Applicable to the

Los Angeles By-Products Leases

Please see the accompanying leases, subleases, assignments, consents and other related documents between the Company and various parties (herein referred to as "Leases"). The company is stating a claim of confidentiality as stated in each of the following responses and pursuant to sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C., §9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b) and any other relevant and/or applicable Statutes.

The following confidentiality claims are applicable to each and every of the following Lease documents:

<u>Lessor</u>	<u>Lessee</u>	<u>Date of Document:</u>
Los Angeles By-Products Co.	The Flintkote Company	August 9, 1965
Los Angeles By-Products Co.	John Wells Golf Shop, Inc.	November 22, 1999
Los Angeles By-Products Co.	Karlton Spindle	September 2001
Karlton Spindle	Marvin V. Salazar	November 1, 2003
Harout Broutian	Ruben Santana & Danny Santana	December 9, 1999
Los Angeles By-Products Co.	Donald Phillips	June 1, 1993
Los Angeles By-Products Co.	A-1 Scrap, Inc.	February 24, 1984
Los Angeles By-Products Co.	A-1 Scrap, Inc.	April 1, 1990
Los Angeles By-Products Co.	Self Serve Auto Dismantlers & A-1 Metals Recycling, Inc.	April 1, 1990
Los Angeles By-Products Co.	Edward A. Borges	April 1, 2002
Los Angeles By-Products Co.	Owner Operator Ready Mix Concrete	April 1, 1995

Los Angeles By-Products Co.	Owner Operator Ready Mix Concrete	April 1, 1981
Los Angeles By-Products Co.	Le Valley Ready Mix Co.	April 1, 1964
Los Angeles By-Products Co.	Le Valley Ready Mix Co.	April 1, 1957
Los Angeles By-Products Co.	Cambrian Energy Systems, Inc.	December 8, 1982
Los Angeles By-Products Co.	Detroit Scrap, Inc	August 16, 1973
Arthur Kazarian	Los Angeles By-Products Co.	November 15, 1948
Los Angeles By-Products Co.	A.E. Schmidt Company	May 1966
Los Angeles By-Products Co.	Aetna Auto & Truck Dismantlers, Inc.	August 8, 1986
Los Angeles By-Products Co.	Skyline Concrete Sales Co.; Sun Valley Ready Mix Corp.; and Time Transportation Inc.	April 1, 1964
Consolidated Rock Products Co.	Los Angeles By-Products Co.	December 5, 1962
Graham Brothers, Incorporated	Los Angeles By-Products Co.	April 8, 1948
Los Angeles By-Products Co.	Sam Adlen and Dorothy Adlen	May 1, 1962
Los Angeles By-Products Co.	Sam Adlen and Dorothy Adlen	February 14, 1964
Los Angeles, By-Products Co.	J.E. Hooker	May 29, 1958



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Claim of Confidentiality

Applicable to the

Los Angeles By-Products Insurance Information

Please see list of insurance carriers and accompanying policy information. The Company is stating a claim of confidentiality as stated in each of the following responses and pursuant to Sections 104(e) (7) (E) and (F) of CERCLA 42 U.S.C. §9604 (e) (7) (E) and (F), and Section 3007 9b) of RCRA, 42 U.S.C. §6927 (b), and 40 C.F.R. §2.203 (b) and any other relevant and applicable statutes.

<u>Insurance Carrier</u>	<u>Policy Term</u>	<u>Policy Type/Policy No.'s</u>
Travelers (Calvert Fire Insurance Co.)	11/17/75-11/17/76	CGL GLA625892
Bellefonte Underwriters	12/01/77-12/01/78	Primary CGL CAG227870
Allianz Insurance Co.	12/01/78-12/01/79	CGL GLA504257
	12/01/79-12/01/80	CGL Primary GLA504016
	12/01/80-12/01/81	CGL Policy GLA509159
Continental/ Harbor	06/01/68-06/01/65	Comprehensive Liability 100191
London Market Insurer (Lloyds of London)	04/06/53-04/03/56	PD Liability LL43140
	06/01/56-06/01/62	PD Liability LA58426
Agricultural Excess & Surplus	12/01/84-12/01/85	CGL Primary PR023996
	12/01/85-12/01/86	Primary CGL PL024245

Pacific Indemnity	06/01/41-06/01/53	Comprehensive Liability LAC12844
	06/01/53-06/01/56	Comprehensive Liability LAC70330
	06/01/56-06/01/71	Comprehensive Liability LAC93098

The following confidentiality claims are applicable to each and every insurance policy and to the list of insurance policies produced by the Company and which is confidential information protected by attorney-client privilege and work product doctrine.



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## Response to Information Request

5 The Company's operations at the Penrose landfill portion of the Penrose Facility during the period of time the Company operated at the Penrose landfill was limited to landfill operations until the landfill operations ceased. The landfill operations commence in approximately 1961 and continued until approximately 1985. Only non-hazardous household rubbish, construction materials and dirt were accepted at the Penrose landfill.

In 1982, a methane gas collections system was installed on behalf of the Company.

Since 1982, the Company's operations have consisted of leasing portions of the site.

The Company's operations at the Strathern landfill portion of the Penrose Facility during the period of time the Company operated at the Strathern landfill has been limited to landfill operations. The landfill operations commence in approximately 1992 and have continued to date. Only solid inert materials are accepted at the Strathern landfill.

The Company's operations at the Newberry landfill portion of the Penrose Facility during the period of time the Company operated at the Newberry landfill were limited to landfill operations until the landfill operations ceased. The landfill operations commence in approximately 1948 and continued until approximately 1955. Only non-hazardous household rubbish, construction materials and dirt were accepted at the Newberry landfill.

In approximately 1974, a methane gas collections system was installed on behalf of the Company.

The Company's operations since closure of the landfill have consisted of leasing portions of the site.

6. The Company's operations at the Hewitt Pit Facility during the period of time the Company operated at the Facility was limited to landfill operations until the landfill operations ceased and the landfill was closed. The landfill operations commenced in approximately 1963 and continued until approximately 1979. During the Company's landfill operations, only non-hazardous household rubbish and solid inert materials were accepted at the Facility.

A methane gas collections system was installed on behalf of the Company.

19. The name and address, so far as it is known to the Company, of each tenant during the period of time the Company owned the Penrose Facility is set forth in the leases which are being provided herewith.

20. During the period of time the Company operated at, but did not own, the Penrose landfill portion of the Penrose Facility, said portion was owned by Conrock, 3200 San Fernando Road, P.O. Box 2950 Los Angeles, California, 90051, (213)258-2777.

During the period of time the Company operated at, but did not own, the Hewitt Pit Facility, said Facility was owned by Conrock, 3200 San Fernando Road, P.O. Box 2950 Los Angeles, California, 90051, (213)258-2777.

To the extent located, the lease agreements between the Company and the respective property owners are provided.

22. The Company did not own the Hewitt Pit Facility. The Facility was owned by Conrock, 3200 San Fernando Road, P.O. Box 2950 Los Angeles, California, 90051, (213)258-2777 and was operated as a quarry by Conrock. The Company has not located information in its possession sufficient to enable it to further respond.

23. The owners of the Tuxford Facility prior and subsequent to the Company are as follows:

The prior owners: Pacific States Properties, Inc.,  
Helen M. Farrar, Justine S. Shelly and Emma J. Deacon  
Graham Brothers, Incorporated  
John M. Brown and Nancy J. Brown  
James I. Holt and Mabel C. Holt

Subsequent owners: Gordon Donald Adlen, Sam Adlen and Annie A. Adlen  
since March 7, 1967.

A. Other than the purchase date and sale date of the Tuxford Facility, the Company has no information.

B. The Company has no information.

C. The Company has no information in its possession.

D. The Company has no evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be release at the Tuxford Facility during the period of prior or subsequent ownership or operation.

30. The Company has previously provided scaled maps which are part of the Solid Waste Assessment Tests previously provided. The extent of the Company's information is contained in the documents previously provided and in the additional documents provided herewith.

31. The Company is presently not aware of the existence of any such maps in its possession, custody or control.

32. The Company has previously provided scaled maps which are part of the Solid Waste Assessment Tests previously provided. The extent of the Company's information is contained in the documents previously provided and in the additional documents provided herewith.

41. So far as it is known, copies of the requested information which is in the possession, custody or control of the Company have been or are provided herewith.

42. So far as it is known, copies of the requested information which is in the possession, custody or control of the Company not otherwise previously provided is provided herewith.

44. So far as it is known, the Company has no such information in its possession, custody or control.

45. So far as it is known, the information requested is contained in the documents previously provided and provided herewith.

46. A list of the insurance carriers, policy term, type and number which may afford coverage is being provided.

47. A list of the insurance carriers, policy term, type and number which may afford coverage is being provided.

48. A list of the insurance carriers, policy term, type and number which may afford coverage is being provided.

49. So far as it is known, other than permits for the operation of the landfills or sewer connections, the Company has not obtained any other waste discharge permits under any local, state, or federal environmental laws and regulations, including any waste discharge permits, such as national pollutant discharge elimination system permits.

53. Other than routine monthly trash service, the Company does not generate any waste streams at the Penrose Facility.

62. Other than normal landfill operations, and monthly trash service, the Company has not stored any wastes at the Penrose Facility for shipment or disposal.

65. There have been no leaks, spills or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Penrose Facility.

74. There is no affiliation between the Company and Consolidated Rock Products Company and its predecessors and successors except for the leasing agreement and the purchase agreement of the Penrose landfill portion of the Penrose Facility. The lease and purchase agreement are being provided.

The foregoing information is based upon a diligent review of the Company's records in its possession and control.